

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**CHRISTINA MOUNTAIN**  
9244 Winterfield Lane  
Columbia, MD 21045

**Plaintiff,**

**Civil Action No.: 1:22-cv-3128**

**v.**

**HOPE HOUSE TREATMENT CENTER**  
26 Marbury Dr.  
Crownsville, MD 21032

**Defendant.**

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**COMPLAINT**

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Plaintiff Christina Mountain, and for her complaint against Hope House Treatment Center (hereinafter “Hope House”), respectively avers as follows:

**PARTIES**

1. Plaintiff Christina Mountain is a resident of Maryland.
2. Defendant Hope House Treatment Center is a business principally based in state of Maryland.

**JURISDICTION AND VENUE**

3. This Court has jurisdiction over Plaintiff’s claims under 28 U.S.C. § 1332.
4. Venue is proper under 28 U.S.C. § 1391(b) because Defendants conduct business and can be found in this judicial district.
5. The events giving rise to the claims in this action occurred in this judicial district.
6. Plaintiff has exhausted all administrative remedies with the Equal Employment Opportunity Commission and is in possession of a Notice of Right to Sue.

**FACTUAL BACKGROUND**

7. Christina Mountain, an African American woman, began working as a treatment aid for Hope House in June 2022. As a treatment aid, Mountain worked directly with Hope House clients, by assisting them with addiction.
8. Mountain easily transitioned into the role until interacting with her co-worker, Ron. Ron worked as overnight treatment aid. Ron is white/Caucasian.
9. Mountain's first encounter with Ron was a bit peculiar. Ron told Mountain that no one "knew what he was capable of." Ron also routinely followed Mountain to her car.
10. But in June 2022, Ron referred to Mountain as a "nigger" (hereinafter "n-word") Ron used the word at least four times.
11. In June 2022, Mountain reported the comment to Jim, a Director at Hope House. Jim followed up with Mountain about the complaint, but told Mountain that he could not do anything about it because Ron was "dependable." Jim also apologized on behalf of Ron.
12. On June 29, 2022, Mountain filed a written complaint to human resources. She placed the complaint in the Hope House compliance mailbox.
13. Jim claimed that he informed Paula in Human Resources about Mountain's written complaint about Ron calling her racial slur.
14. Mountain continued to interact with Ron at the facility. Ron was never removed, nor disciplined for the slur.
15. Ron was aware of Mountain's complaint and continued to harass Mountain after she made the complaint.
16. On August 29, 2022, a Hope House client reported Ron for saying the n-word. Ron reported it to Jim.

17. On or about September 7, 2022, Mountain followed up with Paula in Human Resources about Mountain's complaint of discrimination, against Ron. But Paul told Mountain that she never received a complaint.
18. After speaking with Paula, Mountain followed up with Jim. While meeting with Jim in his office, Mountain saw her written complaint on Jim's desk. The complaint was removed from the compliance box. But Ron never submitted Mountain's complaint.
19. In an email conversation with Human Resources, Paul eventually indicated that she was aware of Ron's conduct at the facility. However, no action was ever taken.
20. Given the continuous harassment from Ron and Hope House's failure to take any action on Plaintiff's complaint, Mountain resigned her position on September 13, 2022.

### **CAUSES OF ACTION**

#### **Count 1: Title VII of the Civil Rights Act of 1964 *Hostile Work Environment***

21. Mountain incorporates every preceding paragraph as alleged above.
22. Mountain was subject to discriminatory severe or pervasive conduct in her place of employment based on Plaintiff's race.
23. WHEREFORE, Mountain prays for nominal damages; compensatory damages, in an amount to be determined at trial; punitive damages, in an amount to be determined at trial; attorney's fees and the costs of this litigation; back pay, front pay, and future benefits, as may be appropriate; pre- and post-judgment interest; and any other relief the Court deems necessary and appropriate.

### **JURY DEMAND**

#### **PLAINTIFF DEMANDS TRIAL BY JURY**

Dated: December 5, 2022

By: /s/Ikechukwu Emejuru  
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